

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 21, 2009

ANALYST: Christopher Morse

I. COMMITTEE: Republican Party of Orange County (Federal)
C00158402
Mark W. Bucher, Treasurer
1800 W. Katella Avenue, Suite 210
Orange, CA 92867

TYPE OF COMMITTEE: Party

II. REGISTRATION: July 6, 1982

III. BACKGROUND:

The Committee was sent fourteen (14) Requests for Additional Information (RFAIs) which included reporting errors involving excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to properly itemize contributions from individuals, Federal Election Activity/Levin funds and allocated federal and non-federal activity.

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Republican Party of Orange County (Federal)
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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Prohibited Contributions and Other Impermissible Contributions and Transfers	2008 12G	Schedule A of the Committee's report disclosed the receipt of a prohibited in-kind contribution totaling \$3,292.96 or 41% of the total contributions (Line 11(a)(iii), Column A of the Detailed Summary Page). This contribution was from one (1) corporation.
Mathematical Discrepancies	2008 M6	The Committee's report contained mathematical discrepancies totaling \$80,000.00.
Failure to Properly Itemize Contributions from Individuals	2008 M7	The Committee failed to provide adequate identification for 21 of 42, or 50%, of the contributions from individuals that require itemization.
Federal Election Activity/Levin Funds	2008 M3	On Schedule H5, the Committee failed to provide a breakdown of the transfers received from its Levin account totaling \$2,016.00. The Committee's report contained mathematical discrepancies on Schedule L totaling \$8,064.00.
Federal Election Activity/Levin Funds	2008 M7	The Committee disclosed disbursements totaling \$93,027.81 for a 3-month period; however, the reports failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.
Federal Election Activity/Levin Funds	2008 M10	The Committee disclosed disbursements totaling \$162,428.81 for a 3-month period; however, the reports failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.
Federal Election Activity/Levin Funds	2008 30G	On Schedule B, the Committee disclosed \$7,168.00 in disbursements made for "Printing and Mailing" and "100% Federal: Postage," but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates.
Federal Election Activity/Levin Funds	2008 YE	The Committee disclosed disbursements totaling \$101,442.61 for the 3-month period; however, the reports failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.
Allocated Federal and Non-Federal Activity	2007 M10	Line 18(a), Column A of the Detailed Summary Page disclosed \$101,198.11 in transfers from the non-federal account for allocable activity for a 3 month period. However, Line 21(a)(ii), Column A disclosed \$93,218.41 in the non-federal share of disbursements, resulting in an apparent excessive transfer of approximately \$7,979.70 from the non-federal account. Schedule H4 disclosed an event year-to-date total for

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		<p>administrative expenses of \$186,476.30; however, FEC calculations disclose this total to be \$182,572.30, resulting in a discrepancy of \$3,904.00.</p> <p>The Committee failed to properly disclose corporate in-kind donations in connection with administrative expenses totaling \$4,997.12 on Schedules H3 and H4.</p>
Allocated Federal and Non-Federal Activity	2007 M11	<p>Schedule H4 disclosed an event year-to-date total for administrative expenses of \$208,328.95; however, FEC calculations disclose this total to be \$204,424.95, resulting in a discrepancy of \$3,904.00.</p> <p>Schedule H4 disclosed \$343.78 in MEMO entries for apparent reimbursements to individuals; however, there were \$2,628.16 in reimbursements reflected on Schedule H4, a \$2,284.38 discrepancy.</p>
Allocated Federal and Non-Federal Activity	2008 30G	<p>On Schedule H2, the Committee disclosed an allocation ratio for one (1) event; however, Schedule H4 does not disclose payments for this activity.</p> <p>On Schedules B and H4, the Committee disclosed \$6,000.00 in two (2) disbursements made for "Fundraising: Fundraising Services" and "Fundraising Services," but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p>

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